

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ETHOSENERGY (GBR) LIMITED f/k/a)	No: 1:17-cv-02608-SO
WOOD GROUP GAS TURBINE)	
SERVICES, LTD.)	Judge Solomon Oliver, Jr.
)	
Plaintiff,)	
)	
vs.)	
)	
PACS SWITCHGEAR, LLC, PACS)	
INDUSTRIES, INC., an Ohio corporation,)	
and PACS INDUSTRIES, INC., a New)	
York corporation,)	
)	
Defendant.)	

PLAINTIFF'S SUPPLEMENT TO MOTION FOR SANCTIONS

Plaintiff, EthosEnergy (GBR) Limited f/k/a Wood Group Gas Turbine Services, Ltd. ("Ethos"), by and through its attorneys, Tucker Arensberg, P.C., files the within Supplement to Motion to Compel Discovery, stating as follows:

1. Plaintiff, EthosEnergy (GBR) Limited f/k/a Wood Group Gas Turbine Services, Ltd. ("Ethos") brings this action against, inter alia, PACS Switchgear, LLC ("PACS"), asserting claims for breach of warranty arising out of the purchase of twelve (12) generator circuit breakers for installation at a power plant being constructed by Ethos in Ashkelon, Israel.

2. On December 18, 2018, Ethos filed a Motion for Sanctions [ECF Document No. 21] arising out of PACS' failure to comply with this Court's Order dated November 29, 2018, requiring the service of discovery responses within twenty (20) days [ECF Document No. 20].

3. Argument on the Motion for Sanctions was held by way of a telephone conference occurring on April 5, 2019.

4. After hearing extended argument from counsel for Ethos and counsel for PACS on the Motion for Sanctions during the telephone conference, the Court granted the Motion and ordered PACS to reimburse Ethos for the counsel fees incurred in connection with the Motion to Compel Discovery and the Motion for Sanctions. See Minute Order of April 4, 2019, ECF Document No. 28

5. The Court further requested that counsel for Ethos submit an Affidavit setting forth the fees and costs incurred in connection with the Motion to Compel Discovery and the Motion for Sanctions.

6. Attached hereto as Exhibit "A" is an Affidavit from Christopher W. Cahillane, counsel for Plaintiff, setting forth the fees incurred in connection with the Motion to Compel Discovery and the Motion for Sanctions, the total of which was \$3,259.50.

7. Ethos accordingly respectfully requests that this Honorable Court enter a supplemental order requiring the payment of counsel fees and costs by PACS to counsel for Ethos in the amount of \$3,259.50 within seven (7) days.

WHEREFORE, Plaintiff, EthosEnergy (GBR) Limited f/k/a Wood Group Gas Turbine Services, Ltd., respectfully requests that this Honorable Court enter an Order requiring the payment of counsel fees and costs by Defendant, PACS Switchgear, LLC, to counsel for Plaintiff, EthosEnergy (GBR) Limited f/k/a Wood Group Gas Turbine Services, Ltd., in the amount of \$3,259.50 within seven (7) days.

Respectfully submitted,

TUCKER ARENSBERG, P.C.

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